

Sehnert-Jones, Cynthia

From: White, Marlene
Sent: Friday, May 12, 2017 6:49 AM
To: Sehnert-Jones, Cynthia
Subject: FW: EPA inspection
Attachments: 852.jpg; 851.jpg; DOC042817-2.pdf; DOC042817-1.pdf

Morning Cynthia,

Would you please print this NOV response from Gary Witkovski, date stamp it and file. Please make sure the photos are printed in color. Thanks,

From: Witkovski, Gary
Sent: Friday, May 12, 2017 6:46 AM
To: White, Marlene <white.marlene@epa.gov>
Subject: FW: EPA inspection

From: Britcher, Scott [<mailto:sbritche@mwestmp.com>]
Sent: Thursday, May 11, 2017 3:29 PM
To: Witkovski, Gary <Witkovski.Gary@epa.gov>
Cc: Urban, Kevin <KUrban@mwestmp.com>; Jelinek, Adam <ajelinek@mwestmp.com>; Vanderlind, Pat <pvanderl@mwestmp.com>
Subject: EPA inspection

RCRA 5/12/2017

Please review our response.



568292

Finding #1 Failure to keep a universal waste lamp container closed
40 CFR 273.13 (d) (1)

The clear box tape adhesive wore out rapidly. Using duct tape now. It holds much better.

Finding #2 Failure to Train Employees Annually
40 CFR 265.16 (C)

Training was completed Friday April 28th. See the attached PDF documents showing the sign in sheets.
The annual training schedule was missed.

It is now in our electronic company calendar for yearly training by the end of April every year.

The due date is seen by four people, and will send emails until complete, including upper management.

Finding #3 Failure to label a satellite container with words "Hazardous Waste"
Or have its contents identified.

40 CFR 262.34 (c) (1) (ii)

That barrel is to be checked on our weekly safety tour.

The inspection was conducted April 4th 2017 by Clifford Nelles from Booz Allen Hamilton EPA Contractor
Thanks

Scott
319-533-7490

Scott Britcher

Maintenance/Process Improvement
Midwest Metal Products
800 66th Ave. SW
Cedar Rapids, IA 52404
319-366-6264, ext. 146
Fax: 319-366-0798
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MAY 12 2017
AWMD/WEMM

RCRA Hazardous Waste Training – Topics covered by trainer: Jim King, CHMM, EnviroNET, Inc.

I. PURPOSE

Job duties require training

Training is required by:

(a) Federal Regulations

(b) Company policy

II. GOALS

a. Provide knowledge of the regulatory requirements and company policy on compliance with hazardous waste regulations.

b. Contingency Planning for dealing with Hazardous Waste and Other Emergencies.

c. Give knowledge on company hazardous wastes, recognizing an emergency situation, and how to respond to it.

III. HAZARDOUS WASTE IDENTIFICATION

Defined Hazardous Waste, Universal Waste, Large Quantity Generator.

Large Quantity Generator requirements

IV. WASTES ON SITE

Review waste materials generated at MWMP and which ones are hazardous/universal wastes.

Review precautions for broken fluorescent lamps.

V. THE CONTINGENCY PLAN

Review the Contingency Plan.

VI. GENERAL EMPLOYEE RESPONSIBILITIES

Review emergency response assessment, response actions, chain of command.

VII. SUPERVISOR AND MANAGEMENT RESPONSIBILITIES

Review responsibilities for emergency response, training, drills, inspections, PPE, recordkeeping, reporting.

VIII. REVIEW QUESTIONS

1. What makes a waste a "Hazardous Waste"?

2. What hazardous wastes are generated here at MWMP?

3. Who is your point of contact for a chemical or hazardous waste emergency?

IX. QUESTIONS

Roundtable discussion



A photograph showing a large, rusted metal drum, likely a 55-gallon drum, viewed through a chain-link fence. A white label is affixed to the drum, featuring the text "Hazardous Waste" in bold, black, sans-serif font. The drum's surface is heavily corroded, showing a mix of brown and dark grey. The chain-link fence is made of silver-colored metal and is in the foreground, partially obscuring the drum. In the background, a wooden pallet is visible on the left side.

**Hazardous
Waste**

